

NICKEL INVESTIGATION PLAN

232 Monroe Street Site (MID 980 795 512) Saline, Michigan

DATE: June 29, 2018

This CTI and Associates, Inc. (CTI) Investigation Plan describes actions for investigation of nickel impacts in soil and groundwater at the Adient 232 Monroe Street site. The selection of soil and groundwater sampling locations was based, in part, on the information presented in Appendix A, which includes historical drawings and previous soil sampling results.

CTI's scope of work and anticipated sequence of events are provided in the sections below.

1. Preliminary Activities

- 1.1. Underground utility identification and location marking.
 - 1.1.1. Initiate a Michigan Miss Dig underground utility locate request a minimum of 3 working days prior to field activities.
 - 1.1.2. Coordinate with the City of Saline, as required, to identify area underground utilities.
- 1.2. Prepare a site specific health and safety plan.
 - 1.2.1. Identify and address physical hazards
 - 1.2.2. Identify and address chemical hazards

2. Mobilization

- 2.1. Mobilize personnel, equipment, and materials. CTI anticipates using the following equipment:
 - 2.1.1. Geoprobe®
 - 2.1.2. Support Truck
 - 2.1.3. Dozer
- 2.2. Health and safety
 - 2.2.1. Perform site safety orientation.
 - 2.2.2. Perform daily safety (tailgate) meetings prior to beginning site activities.
 - 2.2.3. Modified Level D personal protective equipment used by onsite personnel
 - Hardhat
 - Safety glasses
 - Protective toe and shank work boots
 - Hearing protection
 - High visibility vests
 - Protective gloves
 - Nitrile, canvas, or other as appropriate to the work task

3. Site Preparation

- 3.1. Surface soil disturbance will be minimized during these activities
- 3.2. A land surveyor will locate planned soil boring and monitoring well locations.
- 3.3. Clear trees/bushes within the work area. Whole trees will be knocked over in place with the



dozer, if possible. Chainsaws will be used as necessary. Depending on size, trees will either be loaded into a haul truck or placed in a stockpile location on the Adient property. CTI will coordinate tree stockpile location with Adient.

4. Soil Borings

- 4.1. The drilling subcontractor will advance up to 24 soil borings using direct-push drilling techniques. See **Figure 1** for soil boring locations.
- 4.2. Borings will be advanced to the top of the clay layer underlying the site (approximately 5-15 feet deep). Soil samples will be collected continuously by a 2" split spoon sampler for field screening and to classify the stratigraphy at each location.
- 4.3. A minimum of 2 soil samples will be collected at each boring location and submitted for laboratory analysis. Sampling intervals will be from 1-2', and the groundwater interface interval. Additional samples may be collected based on PID screening or visible soil staining.
- 4.4. Samples will be collected and submitted to Pace Laboratories for analysis.
 - 4.4.1. Samples will be analyzed for VOCs, Michigan 10 metals, nickel, PCBs, and cyanide using SW 846 methods.
- 4.5. Soils will be returned to borehole or spread in the vicinity of the boring.
- 4.6. All drilling equipment will be decontaminated between each borehole.
- 4.7. A boring log will be completed by a CTI geologist for each borehole.

5. Temporary Groundwater Monitoring Well Installation

- 5.1. The drilling subcontractor will convert up to 10 soil borings into temporary monitoring wells. See **Figure 1** for proposed monitoring well locations.
- 5.2. Wells will be installed to the top of the site-wide confining clay layer (approximately 5-15 feet deep) and screened in the bottom 5' of the saturated zone. If saturated zone is greater than 5' thick, the screened interval will be centered vertically in the saturated zone. Drilling and logging will be as described in Section 4.
- 5.3. Each well will be constructed with a 2-inch polyvinylchloride (PVC) casing and a 5' prepacked screen. A bentonite seal will be placed above the filter pack, and grout will be used to fill annular space to the ground surface.
- 5.4. Temporary well surface completion will consist of the riser (only) to approximately 3-feet above the ground surface and a locking cap.
 - 5.4.1. If the well is later converted to a permanent well, the surface completion will include 4-inch steel protective casing with a locking cap.
- 5.5. All drilling equipment will be decontaminated between each borehole.
- 5.6. A well construction diagram will be completed by a CTI geologist for each installed well.

6. Monitoring Well Development/Sampling

- 6.1. Each newly installed well will be developed to remove fines from the filter pack at lease 24-hour after installation. A submersible pump with disposable polyethylene tubing will be used to purge water from the well until the produced water is clear.
- 6.2. All IDW water will be containerized in 55-gallon drums and temporarily stored onsite for analysis and proper disposal.
- 6.3. Groundwater samples will be collected from each newly installed monitoring well utilizing low-flow sampling methods and submitted to Pace Laboratories for analysis.



6.3.1. Samples will be analyzed for VOCs, Michigan 10 metals, nickel, cyanide, and available cyanide using SW 846 methods.

7. IDW Management

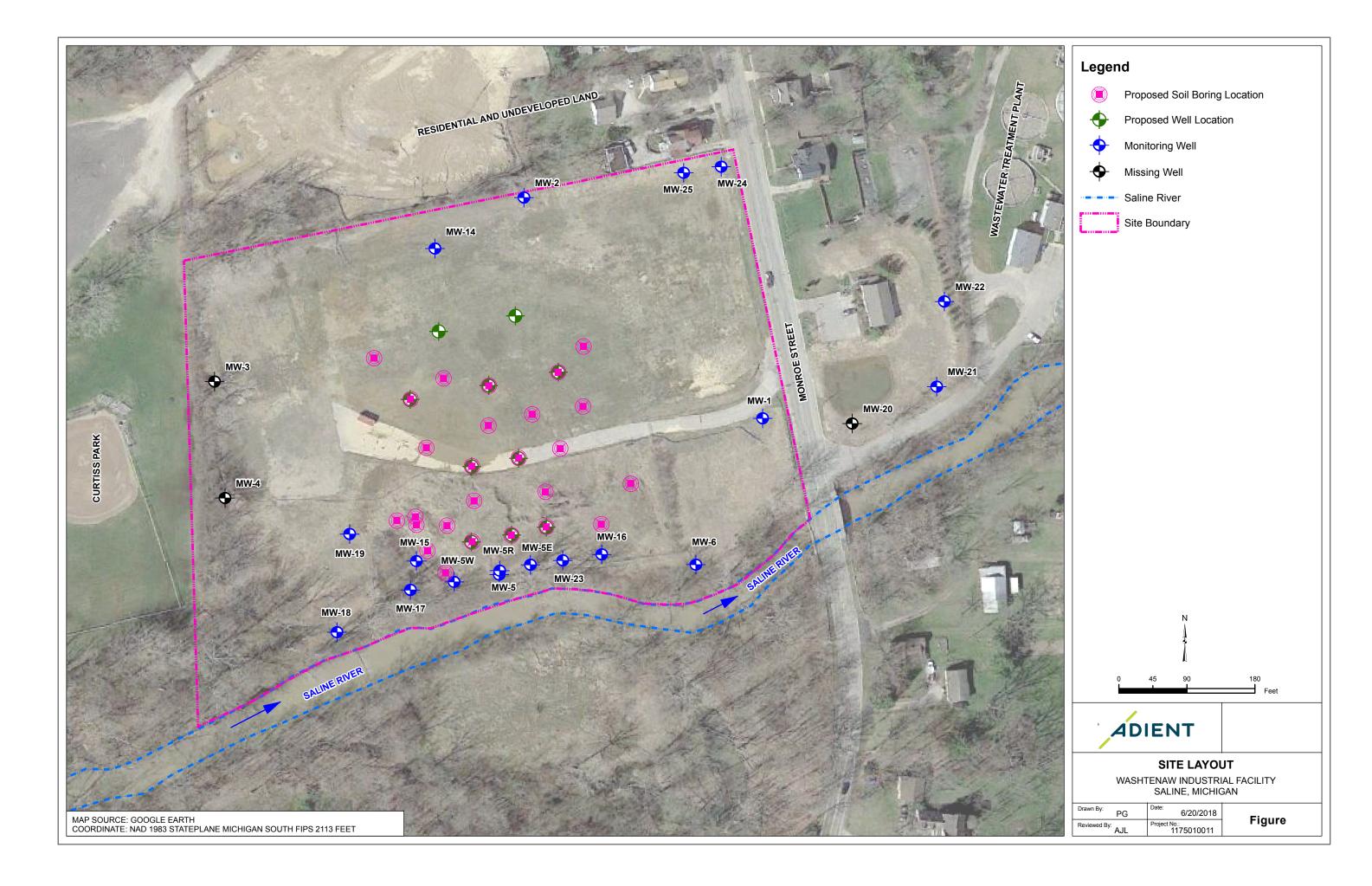
- 7.1. All water waste generated during drilling, well development, purging, and decontamination will be containerized, characterized, and properly disposed of.
- 7.2. All soils generated will be either returned to the borehole or spread in the immediate vicinity of the boring.

8. Demobilization

- 8.1. Demobilize equipment and personnel.
- 8.2. Clean existing asphalt pavement.
- 8.3. Regrade existing Adient site soils if necessary.

FIGURES

Proposed Soil Boring and Monitoring Well Locations



Appendix A

Historical Figures and Supporting Documentation

